

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AKAZOO S.A. SECURITIES
LITIGATION

Case No. 1:20-cv-01900-BMC

CLASS ACTION

**NOTICE OF UNOPPOSED MOTION FOR: (I) PRELIMINARY APPROVAL OF
PARTIAL CLASS ACTION SETTLEMENT; (II) CERTIFICATION
OF THE SETTLEMENT CLASS; AND (III) APPROVAL OF
DISSEMINATION OF NOTICE TO THE SETTLEMENT CLASS**

Lead Plaintiffs Tim Caldwell, Sharon Caldwell, Nikolaos Poulakis, and John Pullen, along with plaintiffs Eva Pareja and Greg Sweet in the action titled, *Pareja, et al., v. Apostolos N. Zervos, et al.*, Case No. 2020CV337418 (Fulton Cty., GA Supreme Court) (collectively, “Plaintiffs”), on behalf of themselves and all others similarly situated, respectfully move this Court on a date and at such time as may be designated by the Honorable Brian M. Cogan, United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for entry of an Order: (i) preliminarily approving the terms of the Settlement between Plaintiffs and Settling Defendants as set forth in the Stipulation and Agreement of Partial Settlement, dated April 22, 2021 (“Stipulation”) submitted concurrently herewith; (ii) preliminarily certifying the Settlement Class; (iii) approving the form and method for providing notice of the Settlement; and (iv) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Motion, the Stipulation and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, the Declaration of Phillip Kim and the exhibits thereto, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Settling Defendants do not oppose this motion. Accordingly, Plaintiffs respectfully request that the Court enter the [Proposed] Order Preliminarily Approving Partial Class Action Settlement and Providing for Notice.

Dated: April 23, 2021

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

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*State Court Lead Counsel for State Plaintiffs
and the Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of April 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim
Phillip Kim